



United States Department of the Interior

FISH AND WILDLIFE SERVICE

California and Nevada Region
2800 Cottage Way W-2606
Sacramento, California 95825



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Susan Fergien
Regional Water Quality Control Board,
Central Valley Region
11020 Sun Center Drive, Suite 200
Rancho Cordova, California 95670-6114

MAY 30 2008

Dear Ms. Fergien:

The U.S. Fish and Wildlife Service (Service) appreciates the opportunity to provide comments regarding development of a Long-Term Irrigated Lands Regulatory Program (ILRP).

The Central Valley Regional Water Quality Control Board's March 19, 2008 scoping document provides proposed scope and goals for the Long-Term ILRP, including potential changes which may affect managed wetlands. The Service has participated in initial discussions with ILRP staff and wetland managers in both the public and private sectors to discuss the impact of these potential changes, and believes there are many unknowns at this point in the scoping process in regarding managed wetlands. The Service agrees the "one size fits all" approach provides program efficiency, yet may not recognize the unique background, setting, and public trust contribution of managed wetlands.

At this time, we will keep Service-managed wetlands in the current Irrigated Land Regulatory Program. We suggest continued discussions with Board staff and other wetland managers to better understand how any proposed program changes will impact managed wetlands and the public trust benefits they provide. In the meantime, we welcome the opportunity to provide refuge tours for any of your staff that would be interested.

Sincerely,

Marge Kolar
Refuge Chief, California and Nevada

cc:

Joe Karkoski, RWQCB, Rancho Cordova, CA
Adam Laputz, RWQCB, Rancho Cordova, CA

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